

relies upon Huang, and asserts that Huang teaches the plurality of value lists having plurality of values that are selectable as a value for an attribute of a product being classified. Correspondingly, the Examiner concludes that it would have been obvious at the time of the invention for one of ordinary skill in the art to combine these references to derive the present invention recited in claim 1, and to designate classes of product groupings in response to a data model thereby providing the advantage of processing groups of products more efficiently. The applicants respectfully disagree for the reasons set forth herein below.

As discussed in the response to the prior Office Action, Povilus is directed to a data structure and method for publishing single, and multi-manufacturer catalogs using a single database. Thus, Povilus is directed to the catalog art and field of endeavor, and is a relevant reference. However, Huang is directed to a decision support system for the management of an agile supply chain. In particular, Huang relates to a system for analyzing and managing service supply chains, and for supporting management decisions. In this regard, the disclosed decision support system of Huang allows the various decision makers in a supply chain to view the supply chain from their own perspective, obtain information, and evaluate decisions concerning past, current, and future performance. Thus, Huang is directed to a manufacturing database management and inventory control system, and does not relate at all to methods or apparatus for catalog data capture, distribution, or storage. Correspondingly, the applicants respectfully contend that the cited Huang reference is not an analogous art, and should not be relied upon by the Examiner to reject the claims of the present application.

The Examiner is reminded that “in order to rely on the reference as a basis for rejection of an applicant’s invention, the reference must either be in the field of applicant’s endeavor, or, if not, then be reasonably pertinent to the particular problem in which the inventor was concerned.” (See MPEP 2141.01(a) citing *In re Oetiker*, 977 F.2d 1443, 1446, 24 USPQ2d 1443, 1445 (Fed. Cir. 1992)). While it is noted and accepted that a reference is reasonably pertinent if, even though it may be in a

different field from that of the inventor's endeavor, it logically would have commended itself to the inventor's attention in considering his problem. (See *id.*, citing *Wang Laboratories, Inc. v. Toshiba Corp.*, 993 F.2d 858, 26 USPQ2d 1767 (Fed. Cir. 1993)).

In the above regard, the cited Huang reference is clearly not in the field of the applicants' endeavor. As noted, Huang relates to an inventory management system, and does not relate at all to a method and apparatus for collecting, distributing, or storing product data for use in a catalog which is the subject of the present application. In addition, the cited Huang reference does not relate at all to the particular problem that is being addressed in the present invention. More specifically, the present invention greatly facilitates the collection, distribution, and storage of products data for use in a catalog. As explained in the previous Amendment, the present invention facilitates the indication of specific values for the product being classified for use in a catalog by allowing the selection of common values for specific attributes of the product. Thus, in the previously described example of a computer, the present invention allows selection of the value for the "RAM size", for example, 256, 512, 1, etc.

In contrast, the cited Huang reference discloses that the problem being addressed is facilitating inventory control process by taking into account the problems associated with availability of materials and machines to satisfy inventory demand. In addition, the cited Huang reference further discloses that another problem addressed is providing a decision support system that takes into account the effect of sales promotions that can quickly deplete inventory and profit margins. Thus, the cited Huang reference summarizes that what is needed is an inventory management system that supports managers with various points of view so as to facilitate understanding the effect of the various decisions that can be made on the supply chain. (See column 1, lines 23-42).

These noted problems addressed by the present invention are completely unrelated to those addressed by the cited Huang reference, and are not pertinent

thereto. These problems and the fields of endeavor of the present invention and the cited Huang reference are not logically related at all, and thus, would not have commended itself to an inventor's attention in considering his problem, which is required for non-analogous references to be applied. Therefore, in view of the above, the applicant respectfully contends that the cited Huang reference is not an analogous reference, and should not be relied upon in rejecting the present claims. Correspondingly, the withdrawal of this rejection, in the allowance of claims 1-9 and 11-17 are respectfully requested.

In addition, even if Huang is considered to be an analogous reference (which it clearly is not), and is combined with Povilus in the manner suggested by the Examiner, such combination still fails to result in the present invention as claimed. In particular, with respect to independent claim 1, it is noted that the cited combination of Povilus and Huang still does not disclose the recited plurality of possible value lists, each possible value list being arranged to identify plurality of values that are selectable as a value for attribute of a product being classified according to the data model.

In the above regard, the portion of Huang that is cited by the Examiner as disclosing such plurality of value lists merely discloses that choices of values for a particular data field may be provided in a brief description of the data fields. In addition, whereas the cited Huang reference discloses providing of possible values for a feature, this is provided when the user is seeking to select a particular product, and is not related, or associated to, the identification of values for an attribute of a product that is being classified according to a data structure suitable for use in a catalog as recited in claim 1 of the present application.

Therefore, even if the references are combined in the manner suggested, such combination fails to disclose, teach, or otherwise suggest the present independent claim 1. Correspondingly, the withdrawal of this rejection, and the allowance of claims 1-7 are respectfully requested, claims 2-7 being ultimately dependent on independent claim 1.

Regarding the Examiner's rejection of independent claim 8, the applicants respectfully contend that the cited Povilus reference (or Huang for that matter) fails to disclose, teach, or otherwise suggest the data structure claimed. As discussed in the previous Amendment, independent claim 8 requires a plurality of manufacturer SKUs which are associates with a plurality of system SKUs. Povilus clearly fails to disclose, teach, or otherwise suggest system SKUs, manufacture SKUs, and customer SKUs as specifically recited, much less system SKUs that are associated with the manufacturer SKUs.

In addition, neither Povilus nor Huang teach, or otherwise suggest a data structure having an attribute table in which selected attributes for each of the products are stored, where the selected attributes are identified by the system SKU as also recited in claim 8. Of course, because possible value lists are not provided, neither Povilus nor Huang teach or suggest that the stored values are at least one of the values from the associated possible list as further recited in claim 8. Furthermore, independent claim 8 further requires that the data structure include a customer mapping table to map between the system SKU to the customer SKU. This feature is also not suggested or taught by the combination of Povilus and Huang.

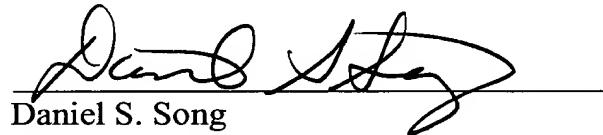
In the Office Action, the Examiner cites various sections of the Povilus reference, but these cited sections only refer to a single SKU and does not disclose, teach, or otherwise suggest the system SKU, the manufacture SKU, and the customer SKU as specifically recited in independent claim 8. In this regard, it is noted that the normalized SKU that is disclosed in Povilus refers to the manufacture SKU that has been modified to be more generic to a family of products, and does not refer to a system SKU or a customer SKU as specifically recited in claim 8.

Therefore, in view of all of the above noted deficiencies, the Applicants again contend that Povilus and Huang, either alone, or in combination, fails to disclose, or otherwise render obvious, the recited data structure having the limitations set forth in independent claim 8. Correspondingly, the withdrawal of this rejection with respect to independent claim 8, and the allowance of claims 8, 9, and 11-17 is respectfully,

claims 9 and 11-17 being ultimately dependent on independent claim 8. To the extent that this rejection is maintained, the Examiner again requested to provide a detailed explanation as to how Povilus, or other references of record, are being applied to read upon the rejected claim, instead of merely summarily asserting that prior art discloses the features recited, when it clearly does not.

In view of the foregoing, it is submitted that the present application is in condition for allowance and a notice to that effect is respectfully requested. However, if the Examiner deems that any issue remains after considering this response, he is invited to call the undersigned to expedite the prosecution and work out any such issue by telephone.

Respectfully submitted,



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